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July 3, 2014

**Via ECF & Regular Mail**

Hon. William H. Pauley III

United States District Court

Southern District of New York

500 Pearl Street- Courtroom 20B

New York New York 10007-1312

Re: **Penceal, et al. v. Empire Beauty School, et al.**  
**Case No. 1:13-cv-7572-WHP**

Dear Judge Pauley:

This office represents Plaintiffs in the above referenced putative class action/collective action.

This letter is a joint request for Your Honor to enter an order extending the deadline for Plaintiffs to file their Third Amended Complaint ("TAC") to July 21, 2014 and Defendants' deadline to answer or otherwise respond to the TAC to August 7, 2014.

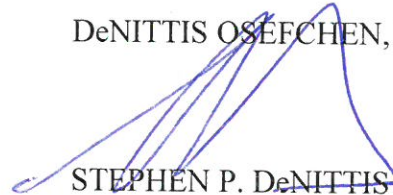
On June 23, 2014, the Court entered a proposed stipulation between the Parties wherein the Parties agreed that Plaintiffs would file a TAC which would address certain issues raised by Defendants' proposed motion to dismiss and potentially narrow the scope of issues between the Parties to July 7, 2014. In that same order, the Court entered the Parties' stipulation which provided Defendants shall answer and/or otherwise respond to Plaintiffs' TAC on or before July 21, 2014.

Since the June 23, 2014 stipulation was entered by the Court, a few other issues have arisen which the Parties are discussing to potential streamline the proper Defendant entities which, if resolved, may impact the TAC Plaintiffs wish to file.

Therefore, Plaintiffs' respectfully request the Court to enter the attached stipulation as an Order to allow the Plaintiffs' to July 21, 2014 to file the TAC and Defendants until August 7 to respond to the TAC.

Respectfully submitted,

DeNITTIS OSEFCHEN, P.C.

A handwritten signature in blue ink, appearing to read "Stephen P. DeNittis", is written over the printed name.

STEPHEN P. DeNITTIS

SPD: jra

Cc: Michael Tiliakos, Esq.  
Leon Greenberg, Esq.  
Lauren Goldberg, Esq.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SABRINA PENCEAL, SHIREEF JONES,  
KRISTY WALDRIP, CRYSTAL DRAHEIM,  
ANDREA DURUISSEAU, LEANDRIA  
GORDON, MARCUS HAYES, SHALINDA  
MALONE, TARA MATHEWS, SHARI  
MCFADDEN, DEDRA MEANS, JATERIA  
WALKER, NIKITA PIERCE, LATACHA  
STALLARD and DAWN SHIMKUS, Individually  
and on behalf of others similarly situated,

Plaintiffs,

v.

EMPIRE BEAUTY SCHOOL INC., EEG INC.,  
EEG LLC, CHIC SCHOOLS, INC., EMPIRE  
EDUCATION GROUP, INC., FRANK  
SCHOENEMAN, MICHAEL D. BOUMAN,  
REGIS CORPORATION, and "John Doe Entities",  
name fictitious, name and number unknown, all  
conducting business as the Empire Education  
Group,

Defendants.

Case No.: 13-CV-7572 (WHP)

**STIPULATION**

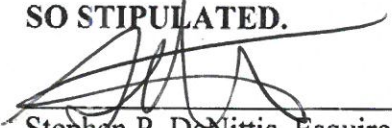
**STIPULATION**

Plaintiffs Sabrina Penceal, Shireef Jones, Kristy Waldrip, Crystal Draheim, Andrea Duruisseau, Leandria Gordon, Marcus Hayes, Shalinda Malone, Tara Mathews, Shari Mcfadden, Dedra Means, Jateria Walker, Nikita Pierce, Latacha Stallard, and Dawn Shimkus, individually and on behalf of others similarly situated ("Plaintiffs"), and Defendants Empire Beauty Schools, Inc., EEG Inc., EEG LLC, Chic Schools, Inc., Empire Education Group, Inc., Frank Schoeneman, Michael D. Bouman, and Regis Corporation ("Defendants") (Plaintiffs and Defendants, collectively referred to as the "Parties"), through their undersigned counsel of record, agree and stipulate as follows:

1. Plaintiffs filed their Second Amended Complaint ("SAC") on May 12, 2014.
2. On June 23, 2014 the Court entered a proposed stipulation between the Parties wherein the Parties agreed that Plaintiffs would file a Third Amended Complaint ("TAC") which would address certain issues raised by Defendants' proposed motion to dismiss and potentially narrow the scope of issues between the Parties on or before July 7, 2014. In that same order, the Court entered the Parties' stipulation which provided Defendants shall answer and/or otherwise respond to Plaintiffs' TAC on or before July 21, 2014.
3. Since the June 23, 2014 stipulation was entered by the Court, a few other issues have arisen which the Parties are discussing to potential streamline the proper Defendant entities which, if resolved, may impact the TAC Plaintiffs wish to file.
4. Therefore the Parties stipulate and agree Plaintiffs shall file their TAC on or before July 21, 2014 and the Defendants shall answer and/or otherwise respond to Plaintiffs' TAC on or before August 7, 2014.

**SO STIPULATED.**

BY:

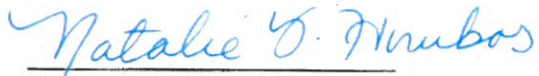
  
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BY:

  
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New York, NY 10036-4086

**Attorneys for Defendants**

**PROPOSED ORDER**

**AND NOW**, this \_\_\_ day of \_\_\_\_\_, 2014, upon consideration of the Parties' Stipulation, it is hereby **ORDERED** and **DECREED** that case management plan as set forth in the Parties' Stipulation is **ADOPTED**.

**IT IS SO ORDERED.**

BY THE COURT:

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Honorable William H. Pauley, III  
United States District Judge